

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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October 13, 2023

**BY EMAIL & ECF**

The Honorable Jennifer E. Willis  
United States Magistrate Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: United States v. Christopher White  
23 Mag. 6330 (UA)**

Dear Judge Willis:

I represent Christopher White in the above-captioned matter. I write to respectfully request (1) an extension until October 23, 2023 to meet the remaining conditions of his bond, and (2) modification of his bond conditions to include travel to the District of Maryland for court purposes only. The government and pretrial services do not object to this request. In addition, Mr. White requests permission to travel to the District of Maryland on October 17, returning on October 18, 2023, to ensure his appearance in court in Maryland.

At Mr. White's presentment on September 21, 2023, the Court set the following bail conditions:

\$25,000 personal recognizance bond to be co-signed by one financially responsible person and one individual with moral suasion over Mr. White (specifically, Delilah Santos, his girlfriend); compliance with pretrial services supervision as directed; curfew set at the discretion of pretrial services; electronic monitoring technology as directed by pretrial services; no possession of any firearm, destructive device, or other weapons; surrender all travel documents with no new applications; travel restricted to the Southern District of New York, the Eastern District of New York, the District of New Jersey, and for court purposes only, the Eastern District of PA.

Mr. White was to be released on his own signature and the signature of Delilah Santos, with the remaining conditions to be met by October 5, 2023.

On September 21, 2023, Mr. White and Ms. Santos signed the bond. Mr. White remained in custody while the Marshals executed a warrant check, finding extraditable warrant issued by Prince George's County in Maryland. Mr. White was held overnight at the MDC and then transferred to New York State custody. Mr. White then appeared in New York State Criminal Court, where he was

remanded on the warrant. Despite waiving extradition, Mr. White remained in New York State custody at Rikers Island.

On October 6, 2023, Prince George's County vacated the warrant. On October 11, 2023, the Manhattan Assistant District Attorney informed the court that the warrant had been vacated; Mr. White was subsequently released from state custody. He has since met with his pretrial services officer. Mr. White must now appear in court in Prince George's, MD on October 18, 2023.

Accordingly, Mr. White respectfully requests: (1) an extension until October 23, 2023 to meet the remaining conditions of his bond, and (2) modification of his bond conditions to include travel to the District of Maryland for court purposes only. The government and pretrial services do not object to this request. In addition, Mr. White requests permission to travel to the District of Maryland on October 17 to ensure his appearance in court the following day and return to New York on October 18, 2023.

Respectfully submitted,


/s/

Marne L. Lenox, Esq.

*Counsel for Christopher White*

cc: Counsel of record

**SO ORDERED:**

  
**THE HONORABLE JENNIFER E. WILLIS**  
United States Magistrate Judge